

REMARKS

Claims 1, 8, and 12 have been amended. No claims have been canceled. No new claims have been added. Claims 1-20 are pending.

INTERVIEW SUMMARY

Applicant's representative wishes to thank the Examiner for the interview conducted on April 6, 2005. The interview included a presentation of the invention, and a discussion of the Gabbita reference. While no agreement was reached, the Examiner agreed to consider a Supplemental Amendment to be filed after the interview.

THE OUTSTANDING OFFICE ACTION

Claims 1-4 and 6-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Gabbita (U.S. Patent No. 6,349,238). Claim 5 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Gabbita. These rejections are respectfully traversed.

Claims 1, 8, and 12 recite, *inter alia*, "wherein said workflow process management application ... permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed." and "said workflow plan comprise a plurality of standards, each one of said standards inter-relating at least one activity objects with at least one resource objects as a function of time."

Gabbita is directed to a system for managing workflow in a telecommunications company. As illustrated, for example, in Fig. 1C, the telecommunications company must complete several steps to complete the sale of a service to a customer. In particular, the telecommunications company must ensure that different portions (e.g., order entry, provisioning, translations, field operations, and order coordination) of the company work in cooperation to ensure that the service can be activated by the promised date. See column 6, lines 43-51.

Fig. 2 illustrates a system for executing a workflow application. The workflow application accepts orders for new service submitted by a sales force (step 204). The system selects an appropriate work plan (step 206), and schedules and monitors the work (steps 207-210).

Each work plan is created before the system begins to accept orders, and is stored on a database. Each work plan identifies a series of steps and associated resources required to carry out the work specified in the work plan. See column 9, line 13-29. As noted by the Office Action, the database includes a field for identifying a department associated with a resource. Column 28, line 28. However, the portion of the specification cited by the Office Action merely discloses that Gabbita's database includes a field for associating a user with a department. Gabbita does not disclose that workflow is planned on a department-by-department basis. Indeed, Gabbita teaches away from the claimed invention because each work plan describes each step required to perform work without regard to any particular department. Gabbita therefore, cannot be fairly stated to disclose or suggest "wherein said workflow process management application, when executed by said computer, permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, and create a report comparing said workflow plan with said workflow performed" as recited by independent claims 1, 8, and 12.

Further, Gabbita's system receives as its input orders generated by the sales force and schedules work related to each received order to ensure that as many orders as possible are completed by the required date. By contrast, the present invention is directed to setting, for each department of an organization, a planned workflow, and then comparing the planned workflow with the actual workflow. "Workflow" entails more than just orders received from a sales force. In particular, "workflow" refers to both work which must be performed as well as resources required to perform the work. Gabbita's system, beyond setting up the database and permitting the database to be maintained from time to time, does not receive resource information.

Claims 1, 8, and 12 further recite that "said workflow plan comprise a plurality of standards, each one of said standards inter-relating at least one activity objects with at least one resource objects as a function of time." The workflow plan of the present invention is therefore significantly different from that of Gabbita by including a plurality of standards for inter-relating activities and resources (for performing activities) to each other as a function of time. This important aspect of permits work to be planned. For example, the workflow plan of the invention permits a user of the workflow management application to determine whether there is sufficient workers to perform the expected work. This feature is not disclosed or suggested by Gabbita.

Accordingly, this is an additional reason why Gabbita fails to disclose or suggest the above quoted portions of independent claims 1, 8, and 12.

Finally, claim 1 also recites, *inter alia*, "after steps (a), (b), and (c), and responsive to a command, automatically generating, by said computer system, said workflow process management application from said department objects, resource objects, and activity objects." Claims 8 and 12 similarly recite, *inter alia*, "after steps (a)

and (b), and responsive to a command by said user, cause said computer to automatically generate a workflow process management application from said department objects, resource objects, and activity objects.” These limitation are directed to the feature of the invention which permits the application to generate a workflow process management application for an entity modeled by the definition of the department, resource, and activity objects. Thus, the present invention may be used to create different workflow process management applications for almost any type of organization which performs “work.” In contrast, the system disclosed by Gabbita is specifically designed a large telecommunications company. Gabbita fails to disclose or suggest any step of automatically generating a workflow process management application.

Claim 1, 8, and 12 are believed to be allowable over the prior art of record. Depending claims 2-7, 9-11, and 13-20 are believed to be allowable for at least the same reasons as the independent claims.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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